

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

2024 DEC -6 P 3:03

TERRENCE FITCH,

Plaintiff,

Case No. 23-cv-0082

THE STATE OF WISCONSIN, et al.,

Defendant.

**JURY TRIAL
DEMANDED**

**PLAINTIFF INITIAL DISCLOSURES
PURSUANT TO RULE 26**

COME NOW, Terrence Fitch *in Propria Persona* (hereinafter "Plaintiff") hereby serves its initial disclosures on Defendants. These Initial Disclosures reflect the current Knowledge of Plaintiff and are subject to and made without waiving, Plaintiff right to assert any and all objections as to competency, relevancy, materiality, privilege, use or admissibility as evidence, for any purpose, or any of these initial disclosures, or of the subject matter of these initial disclosures, in these or any subsequent proceedings. Plaintiff reserves the right to supplement, amend, correct, or otherwise modify these initial disclosures as investigation and discovery are conducted in accordance with the Federal Rules of Civil Procedure.

I. Witnesses Likely to Have Discoverable Information (26(a)(1)(A)(i))

Plaintiff provides the following names and addresses (where known) of these persons who are likely to have discoverable information Plaintiff may use to support his claims, defenses and affirmative defenses, along with the subjects of that information. Plaintiffs reserve the right to identify additional potential witnesses as discovery progresses.

- A. Joseph Lacroix. Milwaukee Police Department District 1 749 W State St, Milwaukee, WI 53233. Mr. Lacroix is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021.
- B. Tonya Rosales. Milwaukee Police Department District 1 749 W State St, Milwaukee, WI 53233. Ms. Rosales is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021.
- C. Jeffrey Norman. Milwaukee Police Department District 1 749 W State St, Milwaukee, WI 53233. Ms. Rosales is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021. Mr. Norman is likely to have discoverable information related to several correspondence that were sent to Plaintiff on or around July 23, 2021, August 8, 2021, October 20, 2021, January 13, 2023.
- D. Jay Karas. Milwaukee Police Department District 1 749 W State St, Milwaukee, WI 53233. Mr. Karas is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021. Mr. Karas is likely to have discoverable information related to several correspondence that were sent to Plaintiff on or around July 23, 2021, August 8, 2021, October 20, 2021, January 13, 2023.
- E. Jeremy Kenner. Milwaukee Police Department District 1. Kenner is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021. Kenner made contact with Plaintiff on February 18, 2021.
- F. Jadranka Bilandzija. Milwaukee County District Attorney Office 821 W State Street, Milwaukee WI 53233. Ms. Bilandzija is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021.

- G. Michael Wilkerson. Milwaukee District Attorney Office 821 W State Street, Milwaukee WI 53233. Mr. Wilkerson is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021.
- H. Paul Miner. 749 W State St, Milwaukee, WI 53233. Mr. Miner is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021.
- I. Lisa Bangert. 127 E Silver Spring Dr. #200 Whitefish Bay WI. Ms. Bangert is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021.
- J. Associated Bank. 330 E Kilbourn Ave #201, Milwaukee WI. Associated Bank is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021.
- K. Paul Lamar Hunter. 111 Dot Drive #2101 San Antonio, Texas 78216. Mr. Hunter is likely to have discoverable information related to Plaintiff's arrest on February 23, 2021.

II. Documents and Tangible Things Plaintiff May Use to Support its Claims or Defenses

(26(a))

Plaintiff identifies the following categories of all documents, ESI, and tangible things that he may use to support its claims or defenses:

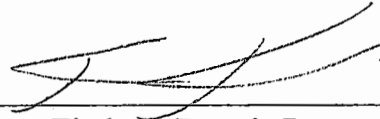
- A. All documents received from Defendants, agents or addressees to Plaintiff.
- B. All communications between Defendants, agents or addressees and Plaintiff.
- C. All documents received from Milwaukee County Employees, City of Milwaukee Employees, agents or acting agents to Plaintiff.
- D. All communications between Milwaukee County Employees, City of Milwaukee Employees, agents or acting agents and Plaintiff.

VERIFICATION

(STATE of WISCONSIN)

(COUNTY of RACINE) ss.

I, Terrence Fitch (PRINT) being duly sworn, deposed and says that I am named as the Plaintiff in the above-entitled proceeding and that the foregoing information is true to his own knowledge, except as to matters herein stated to be alleged on information and belief and as to those matters he believes it to be true.



Terrence Fitch, In Propria Persona. All
Rights Reserved pursuant to UCC-1-308.

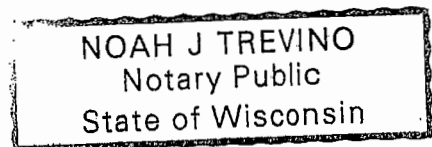
The foregoing instrument was acknowledged before me

This 6th day of December,

By Terrence Fitch

Sworn to before me this 6th day of December, 2024.


Notary Public



- E. All documents received from Associated Bank and Plaintiff.
- F. All communications between Associated Bank and Plaintiff.
- G. All documents received from Lisa Bangert to Plaintiff.
- H. All communications between Lisa Bangert and Plaintiff.
- I. All correspondence received by Plaintiff from Milwaukee Employees on or around July 23, 2021, August 8, 2021, October 20, 2021, January 13, 2023.

III. Computation of Any Claimed Damages by Defendant (26(a))


- 1. Plaintiff was jailed by the defendants without probable cause which caused Plaintiff to suffer a loss of enjoyment of life, liberty and happiness. Estimated Damages Ten Millions (10,000,000.00) USD. Plaintiff was incarcerated for 24 hours without being charged with a crime. See, the matter of Trezevant v. City of Tampa 741 F.2d 336, the city of Tampa.
- 2. Plaintiff reserves his rights to make any other claims or defenses.

IV. Potentially Available Insurance Policies (26(a))

None

Dated: 12-6-2024

STATE OF WISCONSIN



Terrence Fitch

Plaintiff *Propria Personam*

CERTIFICATE OF SERVICE

I hereby certify that this Reply of Plaintiff Terrence Fitch to Amendment Complaint of Appellees was either delivered by email or mailed first class USPS to the following parties, to wit:

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Assistant City Attorney

1090574

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By: _____



Signature

Return All Replies To:

Terrence Fitch

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